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*7 Attorney for Defendant JACQUES LANIER*

8  
 9 **UNITED STATES DISTRICT COURT**

10  
 11 **DISTRICT OF NEVADA**

12  
 13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 Case No.: 2:19-CR-327 RFB-DJA

16 vs.

17 JACQUES LANIER,

18 **MOTION TO APPOINT CO-**  
 19 **COUNSEL**

20 Defendant.

21  
 22 COMES NOW the Defendant, Jacques Lanier, by and through his counsel,  
 23 Lisa Rasmussen, Esq. of the law firm McLetchie Law, and hereby respectfully asks  
 24 the Court to appoint Karen Connolly as co-counsel in this matter. The nature and  
 25 complexity of this case and the looming trial date are such that the interests of justice  
 26 require appointment of co-counsel and Ms. Connolly is well suited to serve that  
 27 role. Consistent with Nevada's CJA Plan and General Order 2021-01, the defense  
 28 has obtained the required approval of the CJA Standing Committee and CJA  
 Resource Counsel, and now seeks formal appointment of co-counsel.

29  
 30 This Motion is made and based upon Guide to Judicial Policies and  
 31 Procedures, Vol 7, Ch 2 § 230.53.20(b), the attached memorandum of points and  
 32

1 authorities, the pleadings and papers on file herein, and any argument to be  
2 entertained by the Court.

3 DATED this 5<sup>th</sup> of November, 2024

4 */s/ Lisa A. Rasmussen*

5 LISA A. RASMUSSEN, Nevada Bar No. 7491

6 **MCLEITCHIE LAW**

7 *Attorney for Defendant Jacques Lanier*

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **A. BACKGROUND**

10 Jacques Lanier is charged with eight (8) counts of Coercion and Enticement  
11 in violation of 18 USC §2422(b); four (4) counts of Sex Trafficking of Children in  
12 violation of 18 USC §1591(a) and (b)(2); Tampering with a Witness in violation of  
13 18 USC §1512(b); Travel with the Intent to Engage in Illicit Sexual Conduct in  
14 violation of 18 USC §2423(b); Sexual Exploitation of Children in violation of 18  
15 USC §2251(a); the Transfer of Obscene Material to a Minor in violation of 18 USC  
16 §1470 and four (4) forfeiture allegations. ECF 243, Superseding Indictment. The  
17 punishments for the Coercion and Enticement counts are mandatory minimum  
18 ten years each count. The punishment for the sex trafficking of children are  
19 mandatory minimums of ten years each count. The punishment for tampering  
20 with a witness is up to 20 years. The punishment for traveling with the intent to  
21 engage in illicit sexual activity is up to 30 years. The punishment for transferring  
22 obscene material to a minor is up to ten years. The punishment for the sexual  
23 exploitation of children is either a mandatory minimum of 15 years or 25 years  
24 depending on Mr. Lanier's prior convictions. Mr. Lanier is 55 years old; he is not  
25 a zero-criminal history offender and he faces potential life imprisonment.

26  
27 Last week, the Court granted Mr. Lanier's Motion to Withdraw his Plea,  
28 and this matter is set for trial on January 13, 2025. ECF 354, 355.

## B. APPOINTMENT OF CO-COUNSEL

This case warrants the appointment of co-counsel because it is extremely difficult and complex. There are numerous named victims, there is substantial electronic discovery as well as telephone download data. There have historically been two counsels appointed to represent Mr. Lanier in this matter.

Given the volume and complexity of the discovery and the legal issues presented, as well as a trial date in approximately three months, the appointment of co-counsel is warranted in this case. The undersigned has conferred with CJA Resource Counsel, who recommends appointment of co-counsel. Additionally, consistent with Nevada's CJA Plan and General Order 2021-01, the defense has obtained the required approval of the CJA Standing Committee.

The defense's preferred co-counsel, Karen Connolly, has been practicing law for over 30 years and she is currently a member of the CJA Panel for this District. Ms. Connolly has assisted the undersigned as co-counsel in other cases, including cases in this District. Ms. Connolly is available to serve as co-counsel in this matter.

For each of these reasons, it is respectfully requested that the Court enter an order approving Karen Connolly as co-counsel in this matter.

DATED this 5<sup>th</sup> of November, 2024

/s/ *Lisa A. Rasmussen*

LISA A. RASMUSSEN, Nevada Bar No. 7491

## MCLETCHIE LAW

*Attorney for Defendant Jacques Lanier*

## IT IS SO ORDERED:

SB

RICHARD F. BOULWARE, II  
United States District Judge

11/6/2024